

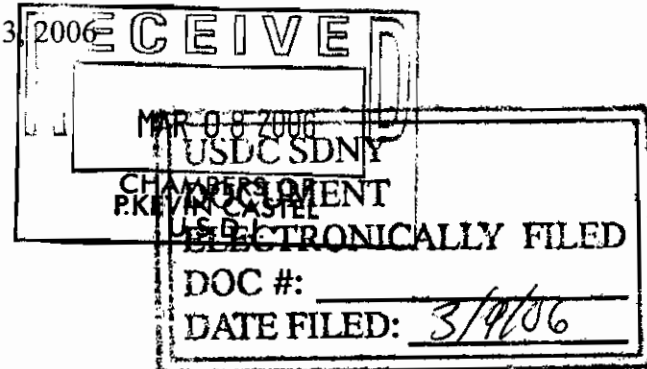
MEMO ENDORSED**MALOOF BROWNE & EAGAN LLC****DAVID T. MALOOF**

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Via US Mail

Hon. P. Kevin Castel
 Daniel Patrick Moynihan U.S. Courthouse
 500 Pearl Street, Room 2260
 New York, NY 10007
 Tel: (212) 805-0262

March 3, 2006



Re: *Nippon Express U.S.A. (Illinois), Inc. v. M/V Chiang Jiang Bridge*
 Case No: 06 Civ. 694
 Our File: 1412.37

Dear Judge Castel:

We represent the Plaintiff Nippon Express U.S.A. (Illinois), Inc. in connection with the referenced cargo damage matter.

The Court has scheduled an Initial Conference in this matter for March 24, 2006, but the Defendants have not yet appeared.

In fact, the claim by Nippon Express was filed primarily to protect a potential time bar. Nippon Express is an intermediate cargo carrier. My understanding is that detailed claim documents have not yet been presented to them by the cargo owner and the cargo owner has not filed a lawsuit. The hope is that the underlying cargo claim can be resolved amicably, and this protective lawsuit, for indemnity, and filed as a precaution, will not have to be pursued.

In short, our request is that the Court postpone the scheduled conference for 60 days. By that time, we are hopeful that all of the cargo claims will be resolved amicably.

We thank the Court for its consideration in this matter

Respectfully submitted,

David T. Maloof

cc: **Via US Mail**

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DTM/rf